

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO**

IN RE:

XIOMARA SIFUENTES BONILLA

DEBTOR

CASE NO. 16-00030 ESL

CHAPTER 13

**MOTION REQUESTING ORDER OF AUTHORIZATION
RE: DEBTORS' INTENTION TO PARTICIPATE IN A LOAN MODIFICATION
PROCESS THROUGH LOSS MITIGATION PROGRAM**

TO THE HONORABLE COURT:

NOW COME, XIOMARA SIFUENTES, debtor, through the undersigned attorney, and very respectfully states and prays as follows:

1. On January 07, 2016, the debtor filed for protection under Chapter 13 of the Bankruptcy Code, 11 U.S.C. §§1301 *et seq.* The debtor scheduled as one of her assets a real property located at Colinas del Este Development Juncos, Puerto Rico. Said property has a lien with Banco Popular de Puerto Rico ("BPPR").

2. Due to debtor's financial situation the debtor intends to visit the Offices of secured creditor BPPR to submit an application (by the debtor) for a mortgage loan modification through a loss mitigation program with secured creditor BPPR.

3. Furthermore, the debtor will file an amended Chapter 13 Plan to provide for the lift of the automatic stay in favor of BPPR for the purpose of the loan modification through BPPR's loss mitigation. The mortgage arrears (pre- and post-petition) not already paid through the Plan will fall within the scope of the loan modification.

4. The debtor hereby respectfully submits to the Court that she needs the approval of this Honorable Court to initiate the loan modification process through the loss mitigation program with BPPR. Once said modification is approved by the bank it will be submitted for evaluation to the Trustee in this case and to this Honorable Court for its approval.

Page -2-

Debtor's Intention to Participate in Loss Mitigation Program
Case no. 16-00030 ESL13

WHEREFORE it is respectfully requested from this Honorable Court that an approval Order upon debtor's intention to modify their mortgage loan through loss mitigation program be entered, in the above captioned case.

NOTICE

Within fourteen (14) days after service as evidenced by the certification, and an additional three (3) days pursuant to Fed. R. Bank. P. 9006(f) if you were served by mail, any party against whom this paper has been served, or any other party to the action who objects to the relief sought herein, shall serve and file an objection or other appropriate response to this paper with the Clerk's office of the U.S. Bankruptcy Court for the District of Puerto Rico. If no objection or other response is filed within the time allowed herein, the paper will be deemed unopposed and may be granted unless: (i) the requested relief is forbidden by law; (ii) the requested relief is against public policy; or (iii) in the opinion of the Court, the interest of justice requires otherwise.

CERTIFICATE OF SERVICE

I CERTIFY, that on this same date a copy of this Notice was filed with the Clerk of the Court using the CM/ECF system which will send notice of same to the Chapter 13 Trustee, the US Trustee's Office, and all CM/ECF participants; I also certify that a copy of this notice was sent via regular US mail to the debtor, Xiomara Sifuentes Bonilla, PO Box 82 Juncos PR 00777; and to all creditors and interested parties, in the above captioned case.

RESPECTFULLY SUBMITTED. In San Juan, Puerto Rico, this 27th day of June, 2016.

/s/ Roberto Figueroa Carrasquillo
USDC #203614
RFIGUEROA CARRASQUILLO LAW OFFICE PSC
ATTORNEY FOR DEBTOR
PO BOX 186 CAGUAS PR 00726
TEL NO 787-744-7699 FAX 787-746-5294
Email: rfigueroa@rfclawpr.com

Label Matrix for local noticing
0104-3
Case 16-00030-ESL13
District of Puerto Rico
Old San Juan
Mon Jun 27 12:12:38 AST 2016

BANCO POPULAR PR
FORTUNO & RIVERA FONT LLC
PO BOX 13786
SAN JUAN, PR 00908-3786

ORIENTAL BANK-CCU
CCU - BANKRUPTCY DEPARTMENT
PO BOX 364745
SAN JUAN, PR 00936-4745

US Bankruptcy Court District of P.R.
Jose V Toledo Fed Bldg & US Courthouse
300 Recinto Sur Street, Room 109
San Juan, PR 00901-1964

AAA
PO Box 70101
San Juan, PR 00936-8101

AEE
PO Box 363508
San Juan, PR 00936-3508

ASUME-LUIS SOTO PENA
PO BOX 71316 SAN JUAN PR 00936-8416

Anderson Financial Services of PR
DBA Borinquen Title Loans
3440 Preston Ridge Rd Ste 500
Alpharetta, GA 30005-3823

Att Services
PO Box 192830
San Juan, PR 00919-2830

BANCO POPULAR DE PUERTO RICO
BANKRUPTCY DEPARTMENT
PO BOX 366818
SAN JUAN PR 00936-6818

Banco Popular de Puerto Ric
PO Box 362708
San Juan, PR 00936-2708

Claro
PO Box 360998
San Juan, PR 00936-0998

Dept of Edu/Osla Servi
525 Central Park Dr Ste
Oklahoma City, OK 73105-1723

EMP. BERRIOS FINANCIERA
P.O. BOX 674
CIDRA, PR 00739-0674

ORIENTAL BANK
Centralized Collections Unit
BOX 364745,
SAN JUAN, P.R. 00936-4745

OSLA STUDENT LOAN SERVICING
US DEPARTMENT OF EDUCATION
PO BOX 18475
OKLAHOMA CITY OK 73154-0475

Rent-A-Center
5501 Headquarters Dr
Plano, TX 75024-5845

(p)C O AMERICAN INFOSOURCE LP
4515 N SANTA FE AVE
OKLAHOMA CITY OK 73118-7901

JOSE RAMON CARRION MORALES
PO BOX 9023884
SAN JUAN, PR 00902-3884

MONSITA LECAROS ARRIAS
OFFICE OF THE US TRUSTEE (UST)
OCHOA BUILDING
500 TANCA STREET SUITE 301
SAN JUAN, PR 00901

ROBERTO FIGUEROA CARRASQUILLO
PO BOX 186
CAGUAS, PR 00726-0186

XIOMARA SIFUENTES BONILLA
PO BOX 82
JUNCOS, PR 00777-0082

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified
by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g)(4).

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Bellevue, WA 98006-1350

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